



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

March 21, 2015

Dave Halemeier, District Ranger
Blue Mountain Ranger District
c/o Sasha Fertig
PO Box 909
John Day, Oregon 97845

Dear Mr. Halemeier:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the proposed Magone Project on the Blue Mountain Ranger District within the Malheur National Forest (EPA Project Number 15-0015-AFS). Our review was conducted in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA).

The DEIS analyzes the range of effects of four alternatives: the no action alternative and three action alternatives. The action alternatives are designed to restore forest structure, composition and density; reduce fuel loadings; maintain or improve habitat for fish and wildlife species; and provide for a variety of social values and opportunities in the watershed. Project components under Alternative 2 (the preferred alternative) include silviculture treatments on 11,872 acres, including 4,686 acres of commercial thinning; 54 miles of new, non-motorized trails and other recreation opportunity improvements; and Magone Lake restoration, including the installation of fish cribs and fish sticks. Alternative 3 generally expands on the activities proposed under Alternative 2, and Alternative 4 generally scales back the activities proposed under Alternative 2.

The EPA is supportive of the overarching goals and objectives of the proposed project, and we find the DEIS to be robust and well organized. Overall, we find the treatments proposed under Alternative 2 to align well with the broad body of science emerging about dry and moist mixed conifer forests¹. We also appreciate the decision to limit activity within the Riparian Habitat Conservation Areas. We have reviewed the proposed Watershed Best Management Practices and Project Design Criteria in Appendix C and concur with the Forest's assessment that the proposed project activities are consistent with the John Day River Basin Total Maximum Daily Load and Water Quality Management Plan.

In our March 2015 comments on the Notice of Intent, the EPA recommended that the Forest undertake an analysis of greenhouse gas emissions consistent with CEQ guidance.² The DEIS states on page 568 that, "As greenhouse gas emissions are integrated across the global atmosphere, it is not possible to determine the cumulative impact on global climate from emissions associated with any number of particular projects. Nor is it expected that such disclosure would provide a practical or meaningful effects analysis for the Magone Project." We recommend that as the EIS is finalized, the Forest Service

¹ http://www.fs.fed.us/pnw/publications/MMC_Synthesis_24Feb14.pdf

² <https://www.whitehouse.gov/administration/eop/ceq/initiatives/nepa/ghg-guidance>

move away from characterizing project-related emissions as not being meaningful. Changes in climate are not attributable to any single action, but are exacerbated by a series of smaller decisions.

As the FEIS is finalized, we encourage the Forest Service to include a comparison of net GHG emissions and carbon stock changes that would occur with and without implementation of the Magone Project. This analysis can incorporate by reference earlier programmatic studies or information such as management plans, inventories, assessments, and research that considers potential changes in carbon stocks, as well as any relevant programmatic NEPA reviews.

Based on our review, we are rating the DEIS as LO (Lack of Objections). We appreciate the opportunity to review and comment on the DEIS, and we look forward to furthering our understanding of this project. If you have any questions about our review, please contact me at (206) 553-1601, or by electronic mail at littleton.christine@epa.gov. Or you may contact Teresa Kubo of my staff at 503-326-2859 or by electronic mail at kubo.teresa@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Christine B. Littleton". The signature is written in a cursive, flowing style.

Christine B. Littleton, Manager
Environmental Review and Sediment Management Unit